

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS-HARVARD
FACULTY CHAPTER,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS AT NEW
YORK UNIVERSITY,

RUTGERS AMERICAN ASSOCIATION
OF UNIVERSITY PROFESSORS-
AMERICAN FEDERATION OF
TEACHERS, and

MIDDLE EAST STUDIES ASSOCIATION,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the DEPARTMENT
OF STATE,

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, and the
DEPARTMENT OF HOMELAND
SECURITY,

TODD LYONS, in his official capacity as
Acting Director of U.S. Immigration and
Customs Enforcement,

DONALD J. TRUMP, in his official capacity
as President of the United States, and

UNITED STATES OF AMERICA,

Defendants.

Civil Action No. 1:25-cv-10685-WGY

MOTION TO ADMIT KAYLA CHEN *PRO HAC VICE*

In accordance with Local Rule 83.5.3 of the Rules of this Court, attorneys for *Amicus Curiae* Presidents' Alliance on Higher Education and Immigration hereby respectfully move for the admission of Kayla Chen *pro hac vice* and state the following in support thereof:

1. Kayla Chen is admitted to practice and is in good standing before the state bar of New York and the United States District Court for the Southern District of New York.
2. Kayla Chen has reviewed and is familiar with the Local Rules of this Court.
3. The undersigned, an attorney admitted to practice and in good standing before this Court, has appeared in this action.

As further grounds therefor, and in support of this Motion, Kayla Chen submits the accompanying affidavit.

Dated: April 10, 2025

Respectfully submitted,

/s/ Lauren Godles Milgroom

Joel Fleming (BBO No. 685285)
Lauren Godles Milgroom (BBO No. 698743)
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Alliance on Higher Education and
Immigration*

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that counsel for *Amicus Curiae* has conferred with counsel for the parties.

No parties oppose the request for leave to file.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants on the Notice of Electronic Filing (NEF) on April 10, 2025.

/s/ Lauren Godles Milgroom
Lauren Godles Milgroom (BBO No. 698743)